



Integral Consulting Inc.
319 SW Washington Street
Suite 1150
Portland, OR 97204

telephone: 503.284.5545
facsimile: 503.284.5755
www.integral-corp.com

January 14, 2016

Ms. Jennifer Sutter
Voluntary Cleanup and Portland Harbor Section
Oregon Department of Environmental Quality
700 NE Multnomah St.
Suite 600
Portland, OR 97232

**Subject: Fourth Quarter 2015 Progress Report for EVRAZ Oregon Steel Facility in
Portland, Oregon WPMVC-NWR-00-10**

Dear Ms. Sutter:

On behalf of EVRAZ Oregon Steel (EOS), Integral Consulting submits to the Oregon Department of Environmental Quality (DEQ) this Fourth Quarter 2015 Progress Report for the EOS facility in Portland, Oregon, located at 14400 N. Rivergate Blvd. This report is submitted in accordance with Section II.H of the June 2000 Voluntary Remediation Investigation Source Control Measure Agreement (Voluntary Agreement) for the EOS facility. This report documents and discusses the project activities from October 1 through December 31, 2015 (fourth quarter of 2015). In addition, this report describes activities planned for the first quarter of 2016.

Actions Completed During the Fourth Quarter 2015

Stormwater Source Control

The ISCO continuous flow monitoring sensor was replaced at the Northern Outfall (003) in December. Loading study stormwater sampling at the Northern Outfall (003) was attempted on December 22; the ISCO sampler malfunctioned and a representative sample was not collected. Sediment thickness in the basin remains below the criteria set for cleanout.

Riverbank Source Control

EOS continued implementing the riverbank source control measure during the fourth quarter of 2015. The source control measure construction is substantially complete. Strider Construction Company finalized bank and upper beach backfilling during the fourth quarter. Marker stakes were installed in the portions of the upper beach and north alcove

where post-excavation sampling indicates remaining subgrade soils exceed 100 µg/kg for total PCB Aroclors. The berm was reconstructed with imported berm backfill soil and topsoil and the surface was covered with jute matting. Approximately 80% of the berm was re-vegetated during the fourth quarter.

The remainder of stockpiled bank soil was disposed of at Riverbend Landfill in McMinnville, Oregon during the fourth quarter. The stockpile area used to stage soil for offsite disposal was deconstructed. A marker layer and 6-in. layer of imported crushed rock were placed and compacted on top of the previously compacted upper beach soil in the mold basement. Excavated upper beach soil and berm soil placed along the north side of the east landfill were compacted, and the compacted surface was hydroseeded during the fourth quarter of 2015.

Groundwater Source Control

No groundwater work was completed by EOS during the fourth quarter of 2015.

Upland Remedial Action / Risk Assessment

Status of the Upland Human Health Risk Assessment (HHRA) remains unchanged during the fourth quarter of 2015 due to focus of resources on the riverbank source control measure.

Other

On December 20, 2015, approximately 50 gallons of hydraulic fuel oil was released when a forklift hydraulic hose failed in the pipe yard near the Pipe Mill. The hydraulic oil was released to the packed gravel surface. EOS employees responded immediately using absorbent clay and spill socks to contain the released oil and ensure storm drains were not impacted. The EOS emergency response contractor arrived shortly after the release, removing free standing oil and water with a vacuum truck and excavating impacted soils. A spill report with details on the clean-up, disposal and soil sampling will be filed with DEQ in the first quarter of 2016, as required.

Problems Experienced During the Fourth Quarter 2015

No significant problems were encountered during the fourth quarter of 2015.

Actions Scheduled for the First Quarter 2016

EOS is planning the following source control and upland closure-related activities for the first quarter of 2016:

Stormwater Source Control

- Monitor sediment depth accumulation in the stormwater clarification basin
- Conduct stormwater sampling from the Northern Outfall (003). Should initial sampling results indicate additional stormwater treatment system upgrades are necessary, EOS will confer with DEQ. If upgrades are necessary, loading study sampling will be discontinued and restarted after upgrades are implemented.

Riverbank Source Control

- Complete planting on the upper beach and gradual riparian slopes. A track-mounted "stinger" will be used to plant cottonwoods on the upper beach in February 2016, assuming river levels remain below the Mean High Water elevation of 9.6 ft National Geodetic Vertical Datum of 1929. If the upper beach remains inundated in Q1-2016, then upper beach planting will be rescheduled for Q4-2016
- Prepare the Source Control Measure construction completion report.

Groundwater Source Control

- Discuss no further action determination status with DEQ.

Upland Remedial Action/Risk Assessment/Feasibility Study

- Finalize revisions to the HHRA and submit to DEQ.

If you have any questions regarding this report, please contact me at (503) 943-3629 or Linda Baker at (206) 957-0314.

Sincerely,



Craig Heimbucher, P.E.
Project Manager

cc: Drew Gilpin and Debbie Deetz Silva – EOS
Joan Snyder – Stoel Rives

Fourth Quarter 2015 Progress Report
January 14, 2016
Page 4

Loren Dunn – Riddell Williams
Linda Baker – Integral Consulting
Eva DeMaria - EPA
File C1144-202